

EXHIBIT B

1 Richard Lyon (Cal Bar No. 229288)
2 rick@dovel.com
3 Christin Cho (Cal. Bar No. 238173)
4 christin@dovel.com
5 DOVEL & LUNER, LLP
6 201 Santa Monica Blvd., Suite 600
7 Santa Monica, California 90401
8 Telephone: (310) 656-7066
9 Facsimile: (310) 656-7069

Attorney for Plaintiff

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 EDIE GOLIKOV, individually and
13 on behalf of all others similarly
14 situated,

15 *Plaintiff,*

16 v.

17 WALMART INC.,

18 *Defendant.*
19
20
21
22
23
24
25
26
27
28

Case No. 2:24-cv-08211-RGK-MAR

**PLAINTIFF'S RESPONSE TO
DEFENDANT WALMART INC.'S
FIRST SET OF INTERROGATORIES**

1 Pursuant to Federal Rule of Civil Procedure 33, Plaintiff Edie Golikov (“Plaintiff”)
2 provides the following objections and responses to Defendant’s first set of
3 interrogatories.

4 Plaintiff responds based on information currently known and available to Plaintiff
5 and her counsel as of the date of these objections and responses. Plaintiff may amend or
6 supplement these responses as additional discovery is taken, facts are learned, research is
7 completed, and arguments are made.

8 By answering an interrogatory, Plaintiff does not concede that the information
9 given is properly discoverable or admissible. Plaintiff reserves the right to object to the
10 introduction of responses into evidence for any purpose.

11 **General Objections**

12 Plaintiff objects to the extent that any interrogatory requests information that is
13 protected from discovery under the attorney-client privilege, the work product doctrine,
14 the common interest privilege, and/or any other applicable privilege or other immunity.
15 Plaintiff will not provide privileged information.

16 Certain definitions, when incorporated into the interrogatories below, render the
17 requests overly broad, unduly burdensome, and not proportional to the needs of the case.
18 Plaintiff objects specifically to the breadth of such interrogatories below and states the
19 scope to which Plaintiff will respond.

20 Plaintiff will respond as required by the Federal Rules of Civil Procedure, the Local
21 Rules of this Court, and this Court’s orders, but will not comply with any instructions
22 that exceed those requirements.

Objections and Responses to Each Interrogatory

INTERROGATORY NO. 1: Identify all accounts that HOUSEHOLD MEMBERS, including YOU, have created on Walmart.com during the past 6 years, including the account numbers, username, email addresses, and telephone numbers associated with the account, when the account was created, and the date of any purchases made through that account.

Response to 1: Plaintiff incorporates the General Objections recited above as if fully stated here. Plaintiff objects to this request as overbroad and seeking information that is not relevant to any party's claims or defenses. Except as objected to, Plaintiff identifies the following information: Plaintiff created an account on Walmart.com associated with username: egolikov@cs.com, email: egolikov@cs.com, and phone number: (818) 943-6390. Plaintiff typically shops in person at Walmart stores, including when she would purchase Walmart Great Value Avocado Oil. Plaintiff is aware of using the online account on November 14, 2021 to purchase Walmart Great Value Avocado Oil.

INTERROGATORY NO. 2: Identify all HOUSEHOLD MEMBERS' (including YOU) club, membership, loyalty, and/or rewards cards with WALMART during the past 6 years, including the associated name, telephone number, email address, and physical address; the account or rewards number; the date the HOUSEHOLD MEMBER signed up for the card and whether it was done online, over the phone, or in person; and the date of any purchases made through or associated with that card.

Response to 2: Plaintiff incorporates the General Objections recited above as if fully stated here. Plaintiff objects to this request as overbroad and seeking information that is not relevant to any party's claims or defenses. Except as objected to, Plaintiff incorporates its response to Interrogatory No. 1. Plaintiff further states that, other than her general online account, Plaintiff has not signed up for a Walmart club, membership, loyalty, or rewards card.

1 **INTERROGATORY NO. 3:** Identify all contact information for HOUSEHOLD
2 MEMBERS, including YOU, during the past 6 years, including all email addresses,
3 telephone numbers, WhatsApp numbers, Google Voice numbers, Slack ID, Telegram
4 ID, Facebook messenger accounts, or any other communication platform identification,
5 such as a screenname.

6 **Response to 3:** Plaintiff incorporates the General Objections recited above as if
7 fully stated here. Plaintiff objects to this request as overbroad, unduly burdensome, not
8 proportional to the needs of the case, and seeking information that is not relevant to any
9 party's claims or defenses.

10 Except as objected to, Plaintiff responds as follows: (i) Plaintiff's email address is
11 egolikov@cs.com; (ii) Plaintiff's telephone number is (818) 943-6390; (iii) Plaintiff's
12 WhatsApp number is (818) 943-6390; and (iv) Plaintiff's Facebook username is
13 egolikov@cs.com. Plaintiff's Household Members include Alex Golikov. Alex Golikov's
14 email address is agolikov13@cs.com; (ii) Alex Golikov's telephone number is (818) 481-
15 0466; and (iii) Alex Golikov's WhatsApp number is (818) 481-0466.

16
17 **INTERROGATORY NO. 4:**

18 Identify all addresses where YOU have resided over the past 15 years.

19 **Response to 4:**

20 Plaintiff incorporates the General Objections recited above as if fully stated here.
21 Plaintiff objects to this request as seeking information that is not relevant to any party's
22 claims or defenses, including for periods of time not relevant here.

23 Except as objected to, Plaintiff responds as follows: Plaintiff's has resided at the
24 following address since 1993: 18322 Collins Street, Unit #C, Tarzana, CA 91356.

1
2 Dated: April 17, 2025

Respectfully submitted,

3 By: /s/ Richard Lyon

4 Richard Lyon (Cal Bar No. 229288)

5 rick@dovel.com

6 Christin Cho (Cal. Bar No. 238173)

christin@dovel.com

7 DOVEL & LUNER, LLP

8 201 Santa Monica Blvd., Suite 600

Santa Monica, California 90401

9 Telephone: (310) 656-7066

10 Facsimile: (310) 656-7069

11 *Attorney for Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2025, the foregoing document is being served by e-mail on counsel of record.

/s/ Richard Lyon
Richard Lyon

Verification

I declare under penalty of perjury under the laws of the United States of American that the foregoing is true and correct, to the best of my knowledge, as to my personal responses to these interrogatories.

Dated: 04/17/2025

Signature: 
Edie Golikov